

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,
v.
BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,
v.
NICOLETTE WERNICK NOMINEE
PARTNERSHIP; MARITAL GST EXEMPT
TRUST F/B/O NICOLETTE WERNICK
U/ARTICLE III OF THE HAROLD WERNICK
REVOCABLE TRUST DTD 9/16/1991, in its
capacity as a Partner of the Nicolette Wernick
Nominee Partnership; MARITAL GST NON-
EXEMPT TRUST F/B/O NICOLETTE WERNICK
U/ARTICLE III OF THE HAROLD WERNICK
REVOCABLE TRUST DTD 9/16/1991, in its
capacity as a Partner of the Nicolette Wernick
Nominee Partnership; M. GORDON EHRLICH, in
his capacity as managing partner of the Nicolette
Wernick Nominee Partnership and as Trustee of the
Marital GST Exempt Trust f/b/o Nicolette Wernick
u/ Article III of the Harold Wernick Revocable
Trust dtd 9/16/1991 and as Trustee of the Marital
GST Non-Exempt Trust f/b/o Nicolette Wernick u/
Article III of the Harold Wernick Revocable Trust

Adv. Pro. No. 10-04616 (SMB)

dtd 9/16/1991; and NICOLETTE WERNICK, individually and in her capacity as partner of the Nicolette Wernick Nominee Partnership and as Trustee of the Marital GST Exempt Trust f/b/o Nicolette Wernick u/ Article III of the Harold Wernick Revocable Trust dtd 9/16/1991 and as Trustee of the Marital GST Non-Exempt Trust f/b/o Nicolette Wernick u/ Article III of the Harold Wernick Revocable Trust dtd 9/16/1991,

Defendants.

STIPULATION EXTENDING TIME TO CONCLUDE MEDIATION

This Stipulation Extending Time to Conclude Mediation (“Stipulation”) is submitted pursuant to the Bankruptcy Court’s Order entered November 10, 2010 (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (“Case Management Procedures Order”).

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the time by which the Parties must conclude mediation in the above-captioned case is extended up to and including January 30, 2015.

The purpose of this Stipulation is to provide additional time for the Parties to resolve this matter through the mediation process as contemplated under the Case Management Procedures Order.

Except as expressly set forth herein, the parties to this Stipulation reserve all rights and defenses they may have, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this Stipulation shall be deemed an original.

Dated as of: January 7, 2015

BAKER & HOSTETLER LLP

By: /s/ Nicholas J. Cremona
45 Rockefeller Plaza
New York, New York 10111
Telephone: 212.589.4200
Facsimile: 212.589.4201
David J. Sheehan
Email: dsheehan@bakerlaw.com
Nicholas J. Cremona
Email: ncremona@bakerlaw.com

Of Counsel:

BAKER & HOSTETLER LLP
811 Main Street, Suite 1100
Houston, Texas 77002-5018
Telephone: 713.751.1600
Facsimile: 713.751.1717
Dean D. Hunt
Email: dhunt@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities
LLC and the Estate of Bernard L. Madoff*

LAX & NEVILLE LLP

By: /s/ Gabrielle J. Pretto
1450 Broadway, 35th Floor
New York, NY 10018
Telephone: 212.696.1999
Facsimile: 212.566.4531
Gabrielle J. Pretto
Email: gpretto@laxnevile.com
Barry R. Lax
Email: blax@laxnevile.com
Brian J. Neville
Email: bnevile@laxnevile.com

*Attorneys for Defendants Nicolette Wernick
Nominee Partnership, Marital GST Exempt
Trust FBO Nicolette Wernick U/Article III of
the Harold Wernick Revocable Trust dtd
9/16/1991, Marital GST Non-Exempt Trust
FBO Nicolette Wernick U/Article III of the
Harold Wernick Revocable Trust dtd
9/16/1991, and Nicolette Wernick*

MORGAN LEWIS & BOCKIUS LLP

By: /s/ Steven Wilamowsky
399 Park Avenue
New York, NY 10022
Telephone: 212.705.7000
Facsimile: 212.752.5378
Steven Wilamowsky
Email: steven.wilamowsky@morganlewis.com

Attorneys for Defendant M. Gordon Ehrlich